

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: § § CASE NO. 19-50900-CAG-7
LEGENDARY FIELD § §
EXHIBITIONS, LLC, ET AL, § § CHAPTER 7
DEBTORS. § §

NOTICE OF REQUEST FOR PRODUCTION OF DOCUMENTS
UNDER BANKRUPTCY RULE 2004

Pursuant to Federal Rule of Bankruptcy Procedure 2004 and Local Bankruptcy Rule 2004, and Federal Rule of Civil Procedure 45, applicable in bankruptcy cases pursuant to Bankruptcy Rule 9016, the Chapter 7 Trustee, Randolph N. Osherow gives notices of intention to serve a request for production of documents on Travelers Property Casualty Company of America. Such request calls for the production of the documents identified on Exhibit "A" to this notice on or before January 20, 2020 at the offices of Barrett Daffin Frappier Turner & Engel, LLP. Pursuant to Federal Rule of Civil Procedure 45(c)(2) and Bankruptcy Rule 9016, the producing party need not appear in person and the Trustee will accept document produced in paper form or by electronic images identical to the original documents. For documents existing as electronically stored information, the Trustee gives notice that the same should be produced in native form.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER TURNER &
ENGEL, LLP

By: /s/ Brian S. Engel

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**ATTORNEY FOR RANDOLPH N. OSHEROW,
CHAPTER 7 TRUSTEE FOR THE
BANKRUPTCY ESTATES OF THE
CONSOLIDATED DEBTORS LEGENDARY
FIELD EXHIBITIONS, LLC, AAF
PROPERTIES, LLC, EBERSOL SPORTS
MEDIA GROUP, LLC, LFE2, LLC, AND WE
ARE REALTIME, LLC**

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on the 24TH day of December, 2019, a true and correct copy of the foregoing notice was served upon counsel of record via the ECF filing notification service or by email to:

Travelers Property Casualty Company of America
P.O. Box 5600
Harford, CT 06102

HUB International
1065 Avenue
FL 4
New York, NY 10018-0831

Randolph N. Osherow
342 West Woodlawn, Suite 300
San Antonio, Texas 78212
Telephone: (210) 738-3001
Facsimile: (210) 737-6312
rosherow@hotmail.com
CHAPTER 7 TRUSTEE

United States Trustee
615 East Houston Street, Suite 533
San Antonio, Texas 78205
Telephone: (210) 472-4640
Facsimile: (210)472-4649

/s/ Brian S. Engel

Brian S. Engel

EXHIBIT "A"
DOCUMENTS AND INFORMATION REQUESTED

I.
DEFINITIONS

Whenever used in this request, the following capitalized terms will have the meaning stated:

- A. **"AAF Entities" and "AAF Entity"** means and includes Ebersol Sports Media Group, Inc. and all of its direct and indirect subsidiaries, including but not limited to Legendary Field Exhibitions, LLC, AAF Players, LLC, AAF Properties, LLC, LFE 2, LLC, and We Are Realtime, LLC.
- B. **"Document" and "Documents"** means and includes "Document" means and includes every type and form of stored or recorded information, whether made, recorded or stored by means of paper, electronic transmission, aural recording, magnetic, optical or electronic storage media and specifically including every thing and all information in any form discoverable under Bankruptcy Rule 2004 and the Federal Rules of Civil Procedure as incorporated into the Federal Rules of Bankruptcy Procedure.
- C. **"AAF Policies" and "AAF Policy"** means and includes all policies of insurance with all endorsements **issued by You** providing or intended to provide coverage to or for the AAF Entities, or any of them, as insured or additional insured, including but not limited to Policy No. R6E JUB-1K75553-8-18 and all worker's compensation, general liability, employer's liability, camp coverage, healthcare and medical, errors and omissions, directors and officers, crime and cybersecurity, fiduciary, employment practices, property, casualty, aircraft, renters and other policies covering all any risks of the AAF Entities, and any of them and all excess and umbrella policies.
- D. **"You" and "Your"** means and includes Travelers Property Casualty Company of America and all of its subsidiaries and affiliates.

II.
INSTRUCTIONS

Whenever information requested is maintained by the producing person in electronic format, the information should be produced in its original and native form and format. If proprietary or special software is required to access the information, the response should identify the specific proprietary software and version. For financial information or database files that can be exported into commercially available software formats, production in such format is requested together with all titles, headings, descriptions and other metadata needed to make the information accessible and understandable.

III.
MATERIALS TO BE PRODUCED

1. A complete copy of each AAF Policy, including all endorsements or modifications, in which any of the AAF Entities are the insured or entitled to coverage as an additional named insured party.
2. All Documents concerning any premium audit under any AAF Policy, including but not limited to any audit worksheets and auditors' notes.
3. All Documents concerning any premium adjustment under any AAF Policy.
4. All Documents concerning the cancellation of any AAF Policy, including but not limited to all Documents regarding any return premium or additional premium that might be due under such AAF Policy and the basis for same.
5. All Documents reflecting Your assumptions, inputs, data and computations and calculations made or considered in determining any Total Estimated Annual Premium, Total Estimated Premium, and Total Estimated Standard Annual Premium concerning any AAF Policy.
6. All Documents provided to You by any AAF Entity, or by any employee or agent of any AAF Entity, concerning any AAF Policy, including but not limited to any applications, payment advices, schedules, payroll records, and employee rolls.
7. All Documents concerning or generated in the course of underwriting any AAF Policy.
8. All records of payments You received from the any AAF Entity, or on behalf of any AAF Entity, including but not limited to any checks, wire advances or confirmations.
9. All claims made against an AAF Policy and the amount of sums paid out on account of the claim.
10. Any Documents concerning communications relating to claims made against any AAF Policy, including whether such claims would be allowed, denied and/or the basis for same.
11. All Manuals of Rules, Classifications, Rates and Rating Plans related to any AAF Policy, including but not limited to those identified in or applicable to Policy No. R6E JUB-1K75553-8-18.
12. All correspondence and any other Documents you received from or provided to HUB International concerning any AAF Entity.
13. All correspondence and any other Documents You received from or provided to HUB International concerning any AAF Policy.
14. Any Documents concerning any insurance premium financing arrangement for any AAF Entity.
15. Any Documents concerning FIRST Insurance Funding Corporation in relation to any AAF Policy, including but not limited to any correspondence with FIRST Insurance Funding Corporation.
16. Any Documents concerning the potential or actual bankruptcy and/or insolvency of any AAF Entity.
17. Communications, including without limitation electronic mails, sent by you to or received by you from any AAF Entity concerning the issuance, underwriting, auditing, cancellation, collection and any other administration of any AAF Policy.